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12 Attorneys for Plaintiff
13 Andrew Modeen

14 UNITED STATES DISTRICT COURT
15 WESTERN DISTRICT OF WASHINGTON

16 Andrew Modeen,

17 Plaintiff,

18 vs.

19 Progressive Finance Holdings, LLC,

20 Defendant.

Case No.: 2:18-cv-00800-RSL

**NOTICE OF VOLUNTARY
DISMISSAL**

**NOTICE OF WITHDRAWAL OF COMPLAINT AND
VOLUNTARY DISMISSAL OF ACTION WITHOUT PREJUDICE
PURSUANT TO RULE 41(a)**

Andrew Modeen, (“Plaintiff”), by Plaintiff’s attorney, hereby withdraws the complaint and voluntarily dismisses this action, without prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

By: /s/ Sarah Stasch
Sarah Stasch, Esq.
Lemberg Law, LLC
Attorney for Plaintiff,
Andrew Modeen

CERTIFICATE OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, and not a party to the above-entitled cause. On January 9, 2019, I served a true copy of foregoing document(s): **VOLUNTARY WITHDRAWAL**.

BY ELECTRONIC FILING: I hereby **Attorney for Progressive Finance Holdings, LLC** certify that on January 9, 2019, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on January 9, 2019,

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By: /s/ Sarah Stasch
Sarah Stasch, Esq.
Lemberg Law, LLC
Attorney for Plaintiff,
Andrew Modeen